

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Northern District of New York

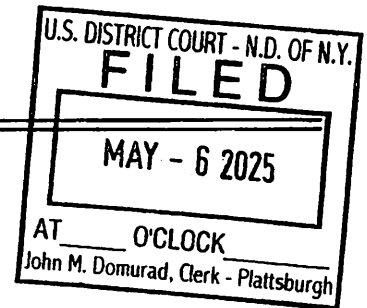
UNITED STATES OF AMERICA

v.

KUMAR, Pankaj

Defendant

Case No. 8:25-MJ-138 (GLF)



CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date(s) of May 4, 2025, in the county of Clinton in the Northern District of New York, the defendant violated:

Code Section

8 U.S.C. § 1326(a)

Offense Description

The defendant, an alien, native and citizen of India, who has been denied admission, excluded, deported, and removed, and has deported the United States while an order of exclusion, deportation, or removal is outstanding, entered and was thereafter found in the United States without the Attorney General of the United States, or his successor, the Secretary of Homeland Security, having expressly consented to his reapplication for admission into the United States.

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Complainant's signature

Alex J. Espinoza, Border Patrol Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: MAY 6, 2025

Judge's signature

City and State: Plattsburgh, NY

Hon. Gary L. Favro, U.S. Magistrate Judge

Printed name and title

United States of America v. KUMAR, Pankaj

On May 4, 2025, at approximately 06:00 a.m., the Champlain, New York Border Patrol Station received a phone call from a concerned citizen stating approximately four people were attempting to be picked up at the intersection of Thompson Road and North Star Road in Perry Mills, New York. Agents responded to the area, which is approximately a half mile south of the United States/ Canada international boundary. While agents were patrolling this area, they observed footprints that crossed North Star Road and continued south towards a heavily wooded area. Agents searched this area and located four people attempting to conceal themselves in the brush. The agents approached these people, identified themselves as Border Patrol Agents, and questioned them as to their citizenship. All four claimed to be citizens of India and did not possess any immigration documents to be within the United States legally. One of the four was later identified as KUMAR, Pankaj.

At the station, KUMAR's biographical information and fingerprints were entered into Department of Homeland Security databases. Record checks revealed that KUMAR did not have any immigration documentation that would allow him to be within the United States legally. Record checks further revealed KUMAR had been previously ordered removed from the United States.

On January 1, 2025, KUMAR was encountered by Border Patrol Agents in Dannemora, New York. On January 2, 2025, KUMAR was issued an Expedited Removal. On January 7, 2025, KUMAR was removed from the United States through the Peace Bridge, New York Port of Entry.

A search of relevant immigration records confirmed that KUMAR has not sought nor obtained the express permission of the Attorney General, or his successor, the secretary of Homeland Security, to return to the United States following his previous removal.